

EXHIBIT A

From: [Assaf, Eugene F.](#)
To: [Harry M. Roth](#); [Chris Placitella](#); ["Jared Placitella"](#); [Jeffrey M. "Pollock"](#)
Cc: [Farrell, Peter A.](#)
Subject: Fwd: Williams v. BASF Catalysts LLC - Pls Ans to BASF 2nd Interrogs
Date: Thursday, December 7, 2017 8:30:16 PM
Attachments: [2017-12-07 Plaintiffs Responses to BASF 2nd Set Interrogatories.pdf](#)
[ATT00001.htm](#)

Gentlemen:

Please let me know when you are available for a meet and confer on Interrogatories 1 to 5.
You didn't provide any factual response, so I suspect there is very little to discuss.

We believe that the failure to *any* meaningful response runs afoul of Fed. R. Civ. P. 33, Chief Judge Linares' August 3, 2017 Opinion and Justice Rivera-Soto's directives to the parties.

We would like to seek the Court's intervention promptly.

Best,

Gene

Begin forwarded message:

From: Jared Placitella <jmplacitella@cprlaw.com>
Date: December 7, 2017 at 8:02:13 PM EST
To: "Farrell, Peter A." <pfarrell@kirkland.com>
Cc: "etunis@heroldlaw.com" <etunis@heroldlaw.com>, "jvilla@wc.com" <jvilla@wc.com>, "dblatt@wc.com" <dblatt@wc.com>, "rryan@connellfoley.com" <rryan@connellfoley.com>, 'Justin Quinn' <JQuinn@rwmlegal.com>, "Assaf, Eugene F." <eassaf@kirkland.com>, "Williams, Michael F." <mwilliams@kirkland.com>, Michael Coren <MCoren@cprlaw.com>, Chris Placitella <cplacitella@cprlaw.com>, "Pollock, Jeffrey M." <JMPollock@foxrothschild.com>, Barbara Driscoll <bdriscoll@cprlaw.com>, "jboyle@khmarino.com" <jboyle@khmarino.com>
Subject: Williams v. BASF Catalysts LLC - Pls Ans to BASF 2nd Interrogs

Peter – Attached please find Plaintiffs' collective responses to BASF's Second Set of Interrogatories. The verification of the acting representative for Plaintiff Ware will be supplied under separate cover.

Thank you,
Jared

Jared M. Placitella, Esquire
C/P/R
Cohen, Placitella & Roth, P.C.

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